

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
v.)	Criminal No. 1:19-CR-10080-NMG
GAMAL ABDELAZIZ et al.,)	
Defendants.)	
)	
)	

**NONPARTY USC’S ASSENTED-TO MOTION FOR LEAVE TO FILE ITS MOTION
TO AMEND PROTECTIVE ORDER UNDER SEAL**

Nonparty University of Southern California (“USC”), by and through its undersigned counsel, hereby moves to file under seal its Motion to Amend Protective Order. As grounds for this Motion, USC states that the motion refers to a currently sealed Court order and contains sensitive personally identifiable information of non-party USC student applicants and parents and should not be placed in the public record.

Accordingly, USC requests leave of the Court to file its Motion to Amend Protective Order under seal.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Counsel for USC hereby certifies that counsel for USC conferred with counsel for John Wilson and Gamal Abdelaziz who assent to USC filing its Motion under seal.

Respectfully submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA,

By its attorneys,

/s/ Debra Wong Yang

Debra Wong Yang (Admitted *Pro Hac Vice*)

Douglas M. Fuchs (Admitted *Pro Hac Vice*)

GIBSON DUNN & CRUTCHER LLP

333 South Grand Avenue

Los Angeles, CA 90071-3197

(213)229-7000

dwongyang@gibsondunn.com

dfuchs@gibsondunn.com

/s/ Anthony E. Fuller

Anthony E. Fuller (BBO #633246)

William H. Kettlewell (BBO# 270320)

Elizabeth C. Pignatelli (BBO #677923)

HOGAN LOVELLS US LLP

125 High St., Suite 2010

Boston, MA 02110

(617) 371-1000

anthony.fuller@hoganlovells.com

bill.kettlewell@hoganlovells.com

elizabeth.pignatelli@hoganlovells.com

Dated: September 30, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 30, 2021.

/s/ Anthony E. Fuller

Anthony E. Fuller